

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
MIDLAND/ODESSA DIVISION**

**NYKREDIT PORTEFØLJE
ADMINISTRATION A/S, OKLAHOMA
FIREFIGHTERS PENSION AND
RETIREMENT SYSTEM, OKLAHOMA
LAW ENFORCEMENT RETIREMENT
SYSTEM, OKLAHOMA POLICE
PENSION AND RETIREMENT SYSTEM,
OKLAHOMA CITY EMPLOYEE
RETIREMENT SYSTEM, POLICE AND
FIRE RETIREMENT SYSTEM OF THE
CITY OF DETROIT, Individually and on
behalf of all others similarly situated,**

Plaintiffs,

V.

No. MO:19-CV-217-DC

**PROPETRO HOLDING CORP., DALE
REDMAN, JEFFREY SMITH, IAN
DENHOLM, and SPENCER D. ARMOUR
III,**

Defendants.

**THE PARTIES' JOINT MOTION
REGARDING PROPOSED CONFIDENTIALITY AND PROTECTIVE ORDER AND
PROPOSED PROTOCOL GOVERNING THE PRODUCTION OF ELECTRONICALLY
STORED INFORMATION**

The Parties, through their undersigned counsel, file this Joint Motion regarding their proposed Confidentiality and Protective Order and proposed Protocol Governing the Production of Electronically Stored Information. In support thereof, the Parties respectfully state as follows:

1. The Parties jointly submit to this Court their proposed Confidentiality and Protective Order and proposed Protocol Governing the Production of Electronically Stored Information; both of which are attached to this motion.

2. The Parties respectfully ask this Court to enter their proposed Confidentiality and Protective Order and proposed Protocol Governing the Production of Electronically Stored Information.

Respectfully submitted,

DATED: March 18, 2022

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Joint Motion Regarding Proposed Confidentiality and Protective Order and Proposed Protocol Governing the Production of Electronically Stored Information was served on all counsel of record via email electronic service and United States Postal Service on March 18, 2022.

/s/ *Kevin Abikoff*

Kevin T. Abikoff